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### **UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA**

1           ANIBAL RODRIGUEZ, SAL  
 2           CATALDO, JULIAN  
 3           SANTIAGO, and SUSAN LYNN  
 4           HARVEY, individually and on behalf of all  
 5           others similarly situated,

6           Plaintiffs,  
 7           vs.  
 8           GOOGLE LLC,  
 9           Defendant.

10          Case No.: 3:20-cv-04688-RS

#### **ADMINISTRATIVE MOTION TO SEAL EXHIBIT TO AZARI DECLARATION**

11          The Honorable Richard Seeborg  
 12          Courtroom 3 – 17th Floor

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully move to seal personal information regarding would-be class members who submitted requests for exclusion from the certified classes. This material is included within the Exclusion Report, which is attached as Exhibit 9 to the Azari Declaration that is being concurrently filed.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Azari Exhibit 9	Plaintiffs	Entirety	Refers to sensitive personal material regarding would-be class members who seek exclusion from the certified classes

Plaintiffs only seek to seal portions of their Rule 26(a)(1) disclosures that reveal the names, email addresses, and similar information regarding non-parties, namely would-be absent class members who submitted requests for exclusion from the certified classes. As explained in earlier motions to seal, there is a compelling reason to seal this information because it would undermine these individuals' privacy interests. *See Nursing Home Pension Fund v. Oracle Corp.*, 2007 WL 3232267, at \*2 (N.D. Cal. Nov. 1, 2007) ("an individual's privacy interest" is a compelling reason to seal a document). Plaintiffs' narrowly tailored proposal "will not interfere with the public's ability to understand the judicial process" because the names and email addresses are not relevant to the issues implicated by the notice process. *Ojmar US, LLC v. Sec. People, Inc.*, 2016 WL 6091543, at \*2 (N.D. Cal. Oct. 19, 2016). The Court previously granted Plaintiffs' request to seal this information in connection with other filings. *See* Dkts. 429, 430. For these reasons, Plaintiffs respectfully request permission to maintain this information under seal.

Dated: March 21, 2025

Respectfully submitted,

By: /s/ Mark C. Mao

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